

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Erich R. Broome
Sherry L. Broome

Debtors

Santander Consumer USA, Inc.
Movant

v.

Erich R. Broome
Sherry L. Broome

Debtors

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Case No.: 16-11397
Chapter 13

Motion for Relief from Stay

ANSWER TO A MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW comes the Debtors, by their Attorney **Thomas W. Fleckenstein** and files the within **Answer to the Motion for Relief from the Automatic Stay**:

1.-4. **ADMITTED.**

5-7. **DENIED.** Strict proof of this allegation is demanded at time of trial.

WHEREFORE, the Debtor herein, respectfully prays that this Honorable Court deny the Motion for Relief from the Automatic Stay.

RESPECTFULLY SUBMITTED:

DATE: August 22, 2016

/s/ Thomas W. Fleckenstein
Thomas W. Fleckenstein, ESQUIRE
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